

Section 9

Environmental Assessment

Environmental Assessment Report

Gold Medal Environmental of DE, LLC (“Gold Medal”), is an existing authorized Resource Recovery Facility. The facility is operated pursuant to a transferred permit (Resource Recovery Facility Permit #SW-03C17) which became effective July 17, 2015. An Environmental Assessment Report developed in accordance with the requirements specified in Section 4.2.1.6 of the Delaware Regulations Governing Solid Waste (DRGSW) was previously submitted on behalf of Gold Medal’s predecessor, Blue River Resources, LLC. That report provided a detailed analysis of the expected potential impacts that the Material Recovery Facility (“MRF”) may have on the environment.

Current Operations

The facility is located at 1000 South Heald Street in Wilmington Delaware. The facility comprises approximately eight (8) acres and is located approximately a ½ mile north of Interstate I-495 and the Route 13 interchange. Gold Medal is currently using the site for the bulking and transfer offsite of source separated and single stream recyclable materials that are separated as needed, consolidated, baled and sold as a commodity. This current operation is authorized under a Resource Recovery Facility Permit (SW-03C17) issued by the Department with an effective date of 7/17/2015.

The MRF operations are currently permitted as a resource recovery facility by the Delaware Department of Natural Resources and Environmental Control (“DNREC”). The operations at the site include the receipt and processing (via sorting, separation and baling) of commingled recyclable materials to produce marketable commodities that are shipped offsite to end users and recyclers.

The facility is located on a restored brownfield site, referred to as Operable Unit 2 (OU-2): West Parcel of the former BUDD Metal Company. A Remedial Completion/Closeout Report that was completed for the site was approved by DNREC’s Site Investigation and Restoration Branch

(“SIRB”) on April 21, 2010 and finalized the restoration of the site for industrial use. The prior remedial activities conducted at the site included soil stabilization and the installation of an engineered cap, composed of a layer of aggregate material (comprised of crushed concrete and/or asphalt pavement) that was placed over the entire site. These engineered controls provide both protection to onsite workers from exposure to subsurface soils and also provide onsite environmental protection and operational controls to minimize potential impacts at the site from both current and future operations.

Environmental Factors

Provided below is a detailed assessment of each potential environmental factors that may be impacted by the operation of the Gold Medal MRF Facility.

Air Quality

The facility is limited to handling the following recyclable materials: paper, plastic, aluminum and bi-metal cans, and other recyclable metals generated principally from consumer commodities and household wastes. These materials are not expected to generate noxious fumes, odors, dusts or hazardous air pollutants. As outlined in the facility’s Operations Plan (see Section 4), all receiving, processing and storage of the recyclable materials and final products produced at the site are conducted in an enclosed building structure. Limiting operations to the interior of the building is expected to minimize the potential generation of dust and odors that could have the potential to migrate offsite. The facility maintains asphalt pavement at the site in the areas used for internal roadways. These paved surfaces help to minimize dusts generated during truck and equipment movement at the site. Based on these conditions the facility is not expected to have any significant adverse effect on air quality in the area.

Water Quality

As stated above, all recyclable materials and final products managed at the site are received, processed and stored inside of an enclosed building/structure. There is no storage of materials conducted outdoors or in areas that are expected to be in contact with precipitation and/or stormwater run-on/runoff. The Main Process Building at the site has a concrete floor that has no floor drains or sumps. The operation is not expected to generate process or wastewater discharges. Consequently, there are no stormwater discharges or runoff that may be impacted by waste management activities at the site. As referenced above, there is an engineered cap at the site composed of a layer of aggregate material, (comprised of crushed concrete and/or asphalt pavement) that is in place throughout the property. When the cap was installed, the site was regraded to prevent ponding and enhance sheet flow runoff at the site. The impervious surface throughout the site reduced potential silt and sediment erosion at the site and minimizes the degradation of water quality from suspended solids. Accordingly, the facility is not expected to impact water quality in the area.

Stream Flow

There are no onsite water courses or any operations that are expected to impact local streams or stream flow in the area.

Fish and Wildlife

The facility is located in a heavy industrial area of New Castle County. As such, there are no fish or wildlife habitats on the property that will be impacted by the operation.

Plants

As stated above, the facility is located in a heavy industrial area surrounded by other manufacturing, processing and industrial operations. All of the operations conducted

onsite related to the receiving, processing and storage of recyclable materials are conducted within an existing enclosed building structure. The property includes an office building, truck scale and an equipment building. The remainder of the site is covered with an engineered aggregate cap consisting of crushed concrete and asphalt pavement. Gold Medal will maintain all existing site improvements and landscape areas at the front of the property. There are currently no other plants or trees located on the site. The facility is not expected to have any significant adverse impacts on plant life either onsite or in the surrounding area.

Threatened or Endangered Species

Provided as Exhibit 1, is a copy of correspondence previously received from the State of Delaware Natural Heritage and Endangered Species Program indicating that there are no current records of State Rare or federal listed plants, animals or natural communities at this site location. Based on this information, the continued operation of the facility is not expected to impact threatened or endangered species.

Water Uses

The facility is equipped with public supplied potable water from the Artesian Water Company. There are no significant uses of water associated with the facility operations. Water use is limited to consumptive use for personnel, onsite sanitary facilities and limited use for cleaning and maintenance.

Based on these limited activities, the facility is not expected to adversely impact water use for the area.

Land Use

The facility is located on a property zoned for HI (Heavy Industry) use. The surrounding land use is primarily comprised of heavy industrial facilities and operations.

The nearest residential properties are located less than ¼ mile to the east of the property boundary and across New Castle Avenue (Route 9).

The facility does not require significant new construction or new land use. However, a covered tipping area is proposed to be added to the existing processing building. The property and onsite structures are existing. As referenced above, the entire site has an engineered barrier or cap comprised of crushed concrete and/or asphalt pavement. Consequently, the facility will not result in any new impervious surface areas at the site. The continuing land use associated with the operation is consistent with the prior use of the site (as a tire recycling facility and former metal fabrication facility) and the current use of adjacent and nearby properties. Accordingly, the facility is not expected to result in significant adverse impacts to the land use onsite or in the surrounding area.

Aesthetics

As detailed above, the facility is located in a heavy industrial area and the property is bordered by facilities with similar uses. The MRF operation utilizes the existing structures at the site (including the Main Process Building, office and truck scale) and will require only limited new construction of a covered tipping area is proposed to be added to the main processing building. No changes to outdoor storage areas are anticipated. Additionally, the operations are being conducted within an enclosed structure. Gold Medal will maintain all aesthetic improvements recently completed at the site. Specifically, new asphalt paving was installed on the facility's main internal traffic areas and will be maintained. Finally, all existing landscaping and other aesthetic improvements will be maintained for the property.

Traffic

The facility is located approximately ½ mile north of Interstate I-495 and the Route 13 interchange at 1000 South Heald Street, New Castle County Delaware. The Materials Recovery Facility operations are conducted pursuant to the current Resource Recovery

Facility Permit (SW-03C17) issued by the Department which was effective July 17, 2015. The MRF operations include separation and sorting capabilities for single stream recycling as well as continued source separated materials processing. The traffic evaluation provided below considers the combined truck activities associated with the combined services conducted at the site.

As detailed above, the facility is located in a heavy industrial area where high volume truck traffic is common and is commensurate with land use. Deliveries of recyclable materials to the facility will be via commercial recycling trucks and other similar vehicles such as roll-off containers. The trucks will primarily access the site using I-495 and Route 13. The use of the portion of South Heald Street north of the facility is expected to be limited to vehicles servicing local areas, representing approximately 20% of the total trucks expected to access the site. Generally, the roadways have been constructed and maintained to handle rather high traffic volume. Based on traffic volume data available from the Delaware Department of Transportation website, the 2015 annual average daily traffic count for the above referenced roads are as follows:

Annual Average Daily Traffic (AADT) in Vehicles Per Day	
Roadway	Del DOT 2015 AADT
US Route 495	87,149
US Route 13 (South of Rt. 495)	29,854
US Route 13 (North of Rt. 495)	27,657
Heald Street (South of Rt. 9 and North of the site)	4,065

The DelDOT traffic map where this data was obtained is provided herein as Exhibit 2.

The facility is currently authorized to accept and process a maximum of 750 tons/day with the average daily volume expected to be approximately 500 tons/day. Incoming shipments of recyclable materials are expected to average approximately 8 tons/load.

This is based on a typical vehicle capacity of 25 cubic yards with a material bulk density

of approximately 3 cubic yards per ton. During routine (average) daily operation of the facility, there will be approximately 63 trucks per day accepted at the facility. Accordingly, during the designated hours that the facility is permitted to receive shipments, the deliveries to the site are expected to average approximately 5 to 8 trucks per hour. At maximum capacity (750 tpd), the number of shipments to the site is estimated to be a maximum of 94 vehicles/day or approximately 8 to 10 trucks per hour. The facility expects that operating near this maximum capacity will be extremely rare.

The commodities produced by the facility have already been densified through baling and source separation. Consequently, outbound shipments are expected to carry a load of approximately 25 tons per truck. Based on this capacity per vehicle, the number of outbound shipments is expected to typically range from 10 to 20 vehicles per day. Outbound shipments may not necessarily coincide with deliveries to the facility as shipment may be conducted outside of the hours that designated hours that the facility is permitted to receive materials.

Based on these traffic volumes, the number of vehicles accessing the facility each day represents far less than one percent of the total traffic volumes for the subject roadways as reported in the 2015 DelDOT traffic data. Accordingly, the additional traffic anticipated as part of the continued operation of this recycling facility operation is not expected to noticeably affect, or adversely impact, traffic in the surrounding area.

Public Health and Safety

The facility is designed and permitted to sort and segregate paper, cardboard, metal, and plastic primarily from consumer commodities and household wastes that are not expected to create any safety or health concerns to the public. There are no other unique characteristics of the facility that would generate any additional impacts on public health and safety.

Cultural, Recreational, and Natural Areas

The facility is located approximately 850 feet southwest of Eden Park and approximately 3,000 feet east of the Russell Peterson Wildlife Refuge. The facility also lies approximately 4,000 feet southeast of the Christina River. There are no other cultural, recreational or natural areas located within a mile of the site. Based on current, permitted operations and materials managed at the site, the facility is not expected to result in significant adverse impacts to any surrounding cultural, recreational or natural areas.

Historic Sites

There are no historic sites within a mile of the facility location. Accordingly, there are no expected adverse impacts from the continued operations on historic sites.

Social and Economic Factors

The facility is located in an existing heavy industrial area of the City of Wilmington that was previously occupied by the Budd Metal Company that operated a metal fabricating company on the site from 1950 through 1986. More recently, the site was used by a tire recycling facility. The site was vacated by the tire recycling facility and the property was not in use prior to the initiation of materials recovery operations by Gold Medal's predecessor in operations, Blue River Resources, LLC. Blue River initially received approval by the Department to accept source separated recyclable materials for bulking and transfer offsite and subsequently expanded the site operations to include materials recovery and the acceptance of single stream recyclable materials. This expanded the use of the site to its current level of operations.

The renewal of the facility is expected to positively impact the social and economic conditions of the surrounding community. As stated above, the facility provides a unique service and continuing need in the community by providing single stream (commingled) recyclables for the surrounding area. Additionally, the facility has generated new jobs

and new revenues for the local economy. The facility also generates ratable property use and tax revenues.

Soil Quality

As stated above, the Gold Medal Facility is located on a site that has been certified as a brownfield (DE-0270) by the State of Delaware, Department of Natural Resources and Environmental Control (DNREC) – Site Investigation and Restoration Branch (SIRB). On April 21, 2010, SRIB approved a Remedial Action Completion Report for the parcel of land where the facility is located. As described above, the remediation and restoration of the property included soil stabilization of the shallow (approximately 3 feet) underlying soils at the site and the installation of an engineered cap to reduce any future impacts related to the underlying soils at the site. Accordingly, the continued operation of the Gold Medal MRF facility is not expected to impact soil quality at the site.

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Exhibit 1

*Correspondence from State of Delaware
Natural Heritage and Endangered
Species Program*



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF FISH & WILDLIFE
NATURAL HERITAGE AND ENDANGERED SPECIES PROGRAM
4876 Hay Point Landing Road
Smyrna, Delaware 19977
Phone: 302-735-8651
Fax: 653-3431

July 14, 2011
(Request received July 11, 2011)

Robert Garner
Compliance Plus Services, Inc.
P.O. Box 186
Hatboro, PA 19040

*RE: Materials Recovery Facility-redevelopment of existing structures
1000 South Heald Street, Wilmington, DE*

Dear Mr. Garner:

Thank you for contacting the Natural Heritage and Endangered Species program about information on rare, threatened and endangered species, unique natural communities, and other significant natural resources as they relate to the above referenced project.

A review of our database indicates that there are currently no records of state-rare or federally listed plants, animals or natural communities at this project site.

We are continually updating records on Delaware's rare, threatened and endangered species, unique natural communities and other significant natural resources. If the start of the project is delayed more than a year past the date of this letter, please contact us again for the latest information. If you have any questions, please contact me at (302) 735-8654 or Edna.Stetzar@state.de.us.

Sincerely,

A handwritten signature in cursive script that reads "Edna J. Stetzar".

Edna J. Stetzar
Environmental Scientist III

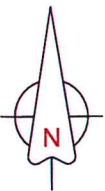
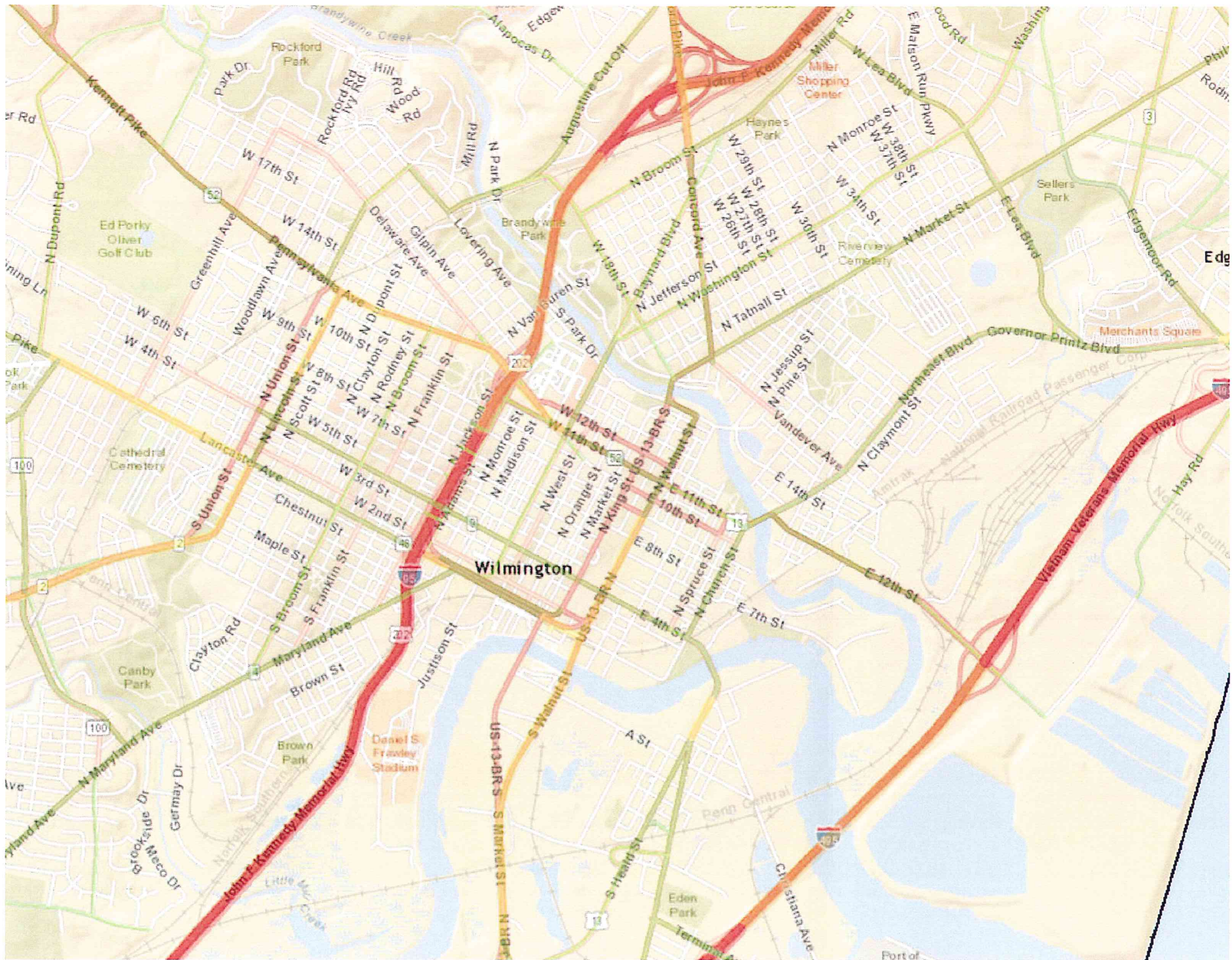
(Please see Invoice on next page)

Delaware's good nature depends on you!

Sent to: sgarner@cps-2comply.com
CPS 2011 Blue River Site

Exhibit 2

Highway Traffic Map



September 26, 2016

DE Traffic Counts

- 0 to 7,000
- > 7,000 to 20,000
- > 20,000 to 41,000
- > 41,000 to 78,000
- > 78,000 to 194,000

NOTE:
IMAGE COPIED FROM GOOGLE.com

Resource Recovery Facility - Area Traffic

Gold Medal Environmental of DE, LLC
1000 S. Heald Street
Wilmington, Delaware 19801

Figure: — Revision No: 0 Date: 09/28/16

COMPLIANCE PLUS SERVICES, INC.

P.O. BOX 186
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Project No.
0338.02

Scale:
None

Approved By:
Jonathan A. Castner

Drawn By:
Thomas Cunningham

COMPLIANCE PLUS
SERVICES, INC.